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September 19, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Peggy Kuo, U.S.M.J.
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, NY 11201-1804

Re: Martinez, et al. v. Atlantis Super Wash Center Inc., et al.
Case No.: 1:23-cv-4667 (CBA) (PK)

Dear Judge Kuo:

This office represents the Defendants Atlantis Super Wash Center Inc., Clean City Laundry Inc., and Nick Mira (hereinafter “Defendants”) in the above-referenced case. Defendants write, with Plaintiff’s consent, to respectfully request an extension of time until Friday, October 6, 2023 to respond to the complaint in this case.

Consistent with Section IV of this Court’s Individual Practice Rules, Defendants submit that:

(i) the current deadline to respond to the complaint is unknown as no affidavit of service has been filed;

(ii) an extension of time is necessary because Defendants’ counsel was engaged in other matters for which extensions could not be sought;

(iii) there have no previous requests for an extension of time to respond to the Plaintiffs’ complaint; and

(iv) Plaintiffs consent to the instant requested extension.

Accordingly, Defendants respectfully submit that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Defendants thank this Court for its time and attention in this case.

Dated: Lake Success, New York
September 19, 2023

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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